

0800 RF 93

DUE
DATE

ACTION

DIST. LTR ENC

BENEDETTI, R.L.	<input checked="" type="checkbox"/>
BENJAMIN, A.	<input type="checkbox"/>
BERMAN, H.S.	<input type="checkbox"/>
CARNIVAL, G.J.	<input type="checkbox"/>
CORDOVA, R.C.	<input type="checkbox"/>
CROUCHER, D.W.	<input type="checkbox"/>
DAVIS, J.G.	<input type="checkbox"/>
FERRERA, D.W.	<input type="checkbox"/>
HANNI, B.J.	<input type="checkbox"/>
HEALY, T.J.	<input type="checkbox"/>
HEDAH, T.G.	<input type="checkbox"/>
HILBIG, J.G.	<input type="checkbox"/>
IDEKER, E.H.	<input type="checkbox"/>
KIRBY, W.A.	<input type="checkbox"/>
KUESTER, A.W.	<input type="checkbox"/>
LEE, E.M.	<input type="checkbox"/>
MANN, H.P.	<input type="checkbox"/>
MARX, G.E.	<input type="checkbox"/>
McKENNA, F.G.	<input type="checkbox"/>
MORGAN, R.V.	<input type="checkbox"/>
PIZZUTO, V.M.	<input type="checkbox"/>
POTTER, G.L.	<input type="checkbox"/>
RILEY, J.H.	<input type="checkbox"/>
SANDLIN, N.B.	<input type="checkbox"/>
SATTERWHITE, D.G.	<input type="checkbox"/>
SCHUBERT, A.L.	<input type="checkbox"/>
SETLOCK, G.H.	<input type="checkbox"/>
SHEPLER, R.L.	<input type="checkbox"/>
SULLIVAN, M.T.	<input type="checkbox"/>
SWANSON, E.R.	<input type="checkbox"/>
WILKINSON, R.B.	<input type="checkbox"/>
WILSON, J.M.	<input type="checkbox"/>
ZANE, J.O.	<input type="checkbox"/>

Buddy M X

Flory D X

mast E X

Lauren P X

Krause J X

Wetherbee X

Reno C X

Taylor K X

CORRES CONTROL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
TRAFFIC	<input type="checkbox"/>	<input type="checkbox"/>

Reviewed for Addressee
Corres. Control RFP24993
DATE BY

Ref Ltr. #

Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

FEB 18 1993

93-DOE-02127

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Dear Mr. Hestmark:

U.S. Environmental Protection Agency, Region VIII is aware of requirements for completion of the OU5 and OU6 Phase I RCRA Facility Investigations/Remedial Investigations (RFI/RI). Requirements for successful completion of the OU5 and OU6 RFI/RI include the installation of temporary Parshall flumes for the accurate measurement of streamflow and estimation of contaminant fate and transport. As many as 10 of these flumes each will temporarily occupy approximately 15 square feet of Rocky Flats Plant (RFP) stream channel beginning in March of 1993. The flumes will be removed at the completion of the RFI/RI process for OU5 and OU6.

It has recently come to the attention of the DOE that EPA, Region VIII, Waste Management Division will make a determination whether requirements for the mitigation of impacts to RFP wetland habitat resulting from the temporary flume installations have been met. These requirements potentially include the preparation and implementation of a wetland impact mitigation plan for the temporary flume installations.

The impacts to wetlands associated with the temporary flume installations in the OU5 and OU6 drainages will be completely mitigated by removal of the flumes upon completion of the OU5 and OU6 RFI/RI process. The flumes will be installed by hand with no need for heavy equipment. Installation of the flume wing walls will be no deeper than 10 inches. Removal of the flumes will require backfilling of the 10-inch wing wall excavations. No vegetation will be disturbed by the installations.

DOE, Rocky Flats Office (RFO) is aware of the need to minimize impacts to wetland habitat as mandated by Executive Order 11990 and Section 404 of the Clean Water Act. DOE, RFO will do all that is necessary to comply with the Clean Water Act Section 404 (b) 1 guidelines to minimize impacts to wetlands as follows.

40 CFR Part 230.10 (a)

There is no practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem. Alternative locations for the temporary flumes were considered in planning the project. The activity is water dependent. Alternative locations were rejected because construction there would disturb a greater channel and wetland surface

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area. Manual flow measurement would not produce the consistency of the installed flow measurement devices, and is therefore unacceptable.

The no action alternative would not impact wetlands. However, taking no action would not meet the need to characterize water conditions to support the OU5 and OU6 RFI's. In particular, OU5 Tech memo 1 requires that flow measurements be obtained with flumes.


40 CFR Part 230.10 (b)

The temporary flume installations will not cause or contribute to violations of any applicable State water quality standards. The installations will not violate any applicable toxic effluent standard or prohibition under section 307 of the Clean Water Act. They will not jeopardize the continued existence of species listed as endangered or threatened under the Endangered Species Act, or adversely modify habitat determined to be critical habitat under the Endangered Species Act of 1973, as amended. The temporary flume installations will not violate any requirement imposed by the Secretary of Commerce under Title III of the Marine Protection, Research, and Sanctuaries Act of 1972.

The proposal for the temporary flumes is, therefore, installation with no mitigation. We would appreciate your prompt attention to this matter to minimize the impact to the quality and schedule of the OU5 and OU6 RFI/RI Reports.

If you have any questions or comments, please contact Jen Pepe of my staff at 966-2184.

Sincerely,


James K. Hartman
Assistant Manager for Transition
and Environmental Restoration

cc:

G. Baughman, CDH
B. Frazier, EPA
B. Miller, EPA
M. Van Der Puy, EMB, RFO
T. Powell, ERD, RFO
N. Castanada, ERD, RFO
G. Hill, EPD, RFO
R. Bennedetti, EG&G
M. Buddy, EG&G
D. Flory, EG&G
E. Mast, EG&G
P. Lauren, EG&G
J. Krause, EG&G
G. Wetherbee, EG&G
C. Reno, EG&G